

SILLS CUMMIS & GROSS P.C.  
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*Attorneys for Defendants Saint Peter's  
Healthcare System, Retirement Plan  
Committee for the Saint Peter's  
Healthcare System Retirement Plan,  
Leslie D. Hirsch, Pamela Teufel,  
Garrick Stoldt, Lisa Drumbore,  
Ronald C. Rak, and Susan Ballestero*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

LAURENCE KAPLAN, on behalf of :  
himself, individually, and on behalf of all : Civil Action No. 13-2941 (MAS)(TJB)  
others similarly situated, :

Plaintiff, :

v.

SAINT PETER'S HEALTHCARE : **NOTICE OF MOTION TO SEAL**  
SYSTEM, RETIREMENT PLAN :  
COMMITTEE FOR THE SAINT :  
PETER'S HEALTHCARE SYSTEM : (Electronically Filed Document)  
RETIREMENT PLAN, LESLIE D. :  
HIRSCH, an individual, PAMELA :  
TEUFEL, an individual, GARRICK :  
STOLDT, an individual, LISA :  
DRUMBORE, an individual, RONALD :  
C. RAK, an individual, SUSAN :  
BALLESTERO, an individual, and :  
JOHN and JANE DOES, each an :  
individual, 1-20, :

Defendants.

TO: Attorneys of Record

COUNSEL:

PLEASE TAKE NOTICE that on February 7, 2022, at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Laurence Kaplan and defendants Saint Peter's Healthcare System, Retirement Plan Committee for the Saint Peter's Healthcare System Retirement Plan, Leslie D. Hirsch, Pamela Teufel, Garrick Stoldt, Lisa Drumbore, Ronald C. Rak, and Susan Ballestero (collectively, the "Defendants"), shall jointly move before the Honorable Tonianne J. Bongiovanni at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 for an Order, pursuant to Local Civil Rule 5.3, to permanently maintain under seal: (i) Exhibits E, F, G, H, J, and K to the Certification of Garrick Stoldt, dated September 30, 2021 (ECF Nos. 254-59), and (ii) Exhibits 6-20 to the Declaration of Karen L. Handorf in Support of Defendants' Motion for Partial Summary Judgment, dated September 30, 2021 (ECF Nos. 252-3 to 252-17).

PLEASE TAKE FURTHER NOTICE that in support of this motion, the parties shall rely upon the accompanying Declaration of Jeffrey J. Greenbaum and Appendix in Support of Joint Motion to Seal. A proposed form of Order is also attached.

Respectfully submitted,  
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*Attorneys for Plaintiff*

Dated: January 4, 2022